

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION

UNITED STATES OF AMERICA

v.

AGHORN OPERATING, INC., et al.

NO. 7:22-CR-00049-DC

MOTION TO WAIVE PERSONAL APPEARANCE AT ARRAIGNMENT AND
TO ENTER NOT GUILTY PLEA IN WRITING
PURSUANT TO FEDERAL RULE OF CRIMINAL PROCEDURE 10(b)
(UNOPPOSED)

On March 6, 2024, the United States filed a “Superseding Indictment” – which repeated the original Counts One-through-Nine and added a new Count Ten (Conspiracy) and a new Notice of Forfeiture. All three defendants have received and read the Superseding Indictment and move to enter their pleas of “Not Guilty” by this writing in lieu of personal appearance.

The United States does not oppose this motion.

Defendant Trent Day is on bond, and the United States agrees that he continue on the same conditions of release.

Respectfully submitted,

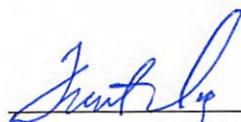
By: /s/Daniel Hurley

Daniel Hurley, Bar No. 10310200
HURLEY, GUINN, SINGH & VONGONTEN
1805 13th Street
Lubbock, Texas 79401
Tel: (806) 771-0700
Fax: (806) 763-8199
E-mail: dwh@hurleyguinn.com

/s/Darrell W. Corzine _____
Darrell W. Corzine
Texas State Bar No. 00790510
KELLY, MORGAN, DENNIS, CORZINE
& HANSEN, P.C.
P.O. Box 1311
Odessa, TX 79760
(432) 367-7271
Fax: 432/363-9121
Email: dcorzine@kmdfirm.com

**ATTORNEY FOR KODIAK
ROUSTABOUT, INC.**

I declare under penalty of perjury that I have read and agree with this pleading.



Trent Day, Defendant, by Trent Day in Odessa, Texas on March 13, 2024.

/s/ David Gerger

Aghorn Operating, Inc., Defendant, by its counsel David Gerger, in Houston, Texas on March 12, 2024.

/s/Darrell W. Corzine

Kodiak Roustabout, Inc., Defendant, by its counsel Darrell Corzine, in Odessa, Texas on March 12, 2024.

CERTIFICATE OF CONFERENCE AND SERVICE

The United States does not oppose this motion. I filed this in the Court's electronic filing system, which serves all parties.

/s/ David Gerger
David Gerger

/s/Brian Carney

Brian Carney
Law Office of Brian Carney
1202 W. Texas Ave.
Midland, TX 79701
(432) 686-8300
Fax: (432) 686-1949
Email: Brian@carneylawfirm.net

/s/Frank Sellers

Frank Sellers
SELLERS LAW FIRM, PC
1612 Summit Avenue, Suite 200
Fort Worth, TX 76102
817-928-4222
Fax: 817-385-6715
Email: frank@sellerstriallaw.com

ATTORNEYS FOR TRENT DAY

/s/ David Gerger

David Gerger, Texas Bar No. 07816360
dgerger@ghmfirm.com
Matt Hennessy, Texas Bar No. 00787677
mhennessy@ghmfirm.com
GERGER HENNESSY & MARTIN LLP
700 Louisiana, Suite 2300
Houston, Texas 77002
713.224.4400 – Telephone
713.224.5153 – Fax

s/ Marla Thompson Poirot

Marla Thompson Poirot, Texas Bar No.
00794736
marla@poirotlaw.com
THE POIROTLAW FIRM, PLLC
PO Box 25246
Houston, Texas 77265
713.816.1660 – Telephone

**ATTORNEYS FOR
AGHORN OPERATING INC.**